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Attorney for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	:	Case No. 2:19-cr-296
	:	
Plaintiff,	:	
	:	
v.	:	<u>STIPULATION TO</u>
	:	<u>EXTEND PRE-TRIAL MOTION</u>
ARTURO SIGALA SALAZAR,	:	<u>DEADLINES</u>
	:	
Defendant.	:	

IT IS HEREBY STIPULATED AND AGREED, by and between Supriya Prasad, Assistant United States Attorney, counsel for the United States of America (hereinafter “the Government”), and Nicholas Wooldridge, Wooldridge Law Ltd., counsel for Arturo Sigala Salazar (“the Defendant”) (collectively, “the Parties”), that the pre-trial motions currently ordered to be filed on or before June 1, 2020, be vacated and extended an additional ten (10) days, as well as the corresponding oppositions and reply deadlines.

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The Stipulation is entered into for the following reasons:

1. The additional time requested herein is not sought for purposes of delay, but to permit counsel for the defendant to complete his investigation in this case to determine whether pre-trial motions will be necessary. Specifically, defense counsel is awaiting this Court to grant an amended order on defendant's application for expert witness fees. Once defense counsel's expert witness is able to view the evidence, and confer with defense counsel, the defense will have completed its investigation, and be able to determine what if any pre-trial motions are necessary.

2. The defendant is incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively complete its investigation.

5. Denial of this request for continuance would waste limited judicial resources, and deny counsel for the defendant sufficient time to effectively represent the defendant.

6. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the Second Stipulation to continue the motion scheduled filed herein.

DATED: May 30, 2020

WOOLDRIDGE LAW, LTD.

By /s/ Nicholas M. Wooldridge
NICHOLAS M. WOOLDRIDGE
Counsel for Defendant

NICHOLAS A. TRUTANICH
U.S. Attorney

By /s/ Supriya Prasad
Supriya Prasad
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, : Case No. 2:19-cr-296
:
Plaintiff, :
:
v. : **STIPULATION TO**
:
ARTURO SIGALA SALAZAR, : **EXTEND PRE-TRIAL**
:
Defendant. : **MOTIONS DEADLINE**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to conduct his investigation in this case in order to determine whether there are any issues that must be litigated and whether pre-trial motions need to be filed.

2. The defendant does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay.

Denial of this request for continuance would waste limited judicial resources, and deny counsel for the defendant sufficient time to effectively represent the defendant

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

CONCLUSIONS OF LAW

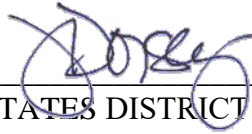
The ends of justice are served by granting said extension.

ORDER

IT IS THEREFORE ORDERED that the pretrial motions deadline is continued to June 11, 2020. Responses due on or before June 25, 2020. Replies due on or before July 2, 2020.

DATED: June 3, 2020.

Nunc pro tunc June 1, 2020.



UNITES STATES DISTRICT JUDGE